

Organic Certification Preparation Manual

For Producer Organisations



Table of contents

Purpose of this guide	3
CHAPTER 1 What is organic certification?	4
 The standard Certification The main stages of the certification process 	5
CHAPTER 2 Certification, when?	6
 Value chain development strategy The level of structuring of the PO	6 6
5. Study of the export market	8

CHAPTER 3

Testimonial: "What we wish we had known before going for organic certification "
1. Three cooperatives of women shea producers in Burkina Faso11 2. The difficulties encountered

CHAPTER 4

Preparation for certification	12
1. Traceability system	12
2. Internal control system	
3. Internal audit	13
4. Choice of an accredited certifier	14
5. Skills required	14
6. Schedule of events	
7. Budget and funding	17
8. Marketing	17

CHAPTER 5

Audits, and after	
1. Process	
2. Process of an external audit	18
3. Audit report and non-conformities to be resolved	19
4. Export	19
5. Long-term monitoring and points of vigilance	20
6. Other certifications	20
References	
Lexicon	
ANNEX 1 Checklist of documents required before applying for certification	22

Checklist of documents needed during the	e audit 23
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Acronyms and abbreviations used

ASEAN	Association of Southeast Asian Nations
AVSF	Agronomists and Veterinarians Without Borders
СВ	Certification Body
СВІ	Centre for the Promotion of Imports from Developing Countries
соі	Certificate of Inspection
EU	European Union
FCFA	African Financial Community Franc
FDPAK	Departmental Federation of Cashew Nut Producers of Kolda
FECEB	Birasso Federation of School Fields
FfL	Fair for Life
FiBL	Research Institute for Organic Agriculture (Forschungsinstitut für biologischen Landbau)
GAP	Good Agricultural Practices
GMO	Genetically Modified Organism
ICC	Internal Control Committee
ICS	Internal Control System
IFOAM	International Federation of Organic Agriculture Movements
IMS	Information Management System
IRI	Institutional Strengthening Index
JAS	Japanese Agricultural Standards
NOP	National Organic Program
OA	Organic Agriculture
PGS	Participatory Guarantee System
PO	Producer Organisation
PRC	Capacity Building Plan (Plan de Renforcement des Capacités)
SME	Small and medium-sized enterprises
SPP	Farmers' symbol

Purpose of this guide

\rightarrow Who is this guide for?

This guide is specifically intended for Producer Organisations (POs) located in countries outside the European Union (EU), as well as for AVSF's technical teams working with them.

→ What can it be used for?

Its objective is to describe the different stages of organic certification, and to highlight the difficulties that can be encountered, in order to anticipate and plan as well as possible this process which can bring a lot to producers and their organisations but can also be full of pitfalls!

\rightarrow How to read it?

Chapters 2, 3, 4 and 5 cover an increasing level of detail and will be of varying interest, depending on the level of knowledge of the reader.

Each chapter is introduced by a presentation of the objective and what is covered in that chapter. At the end of each chapter, or at the end of each paragraph, documentary references are listed: these documents are available on request at the following address: <u>p.dubuit@avsf.org</u>. Many of these references are internal AVSF documents, produced by a country team, which can be adapted for other contexts.



What is organic certification ?

OBJECTIVE OF THIS CHAPTER :

To understand the requirements of the standard which serves as a basis for certification (the rules to be followed), and those of the certifier (who must verify that the rules are followed and applied)

1. The standard

In general, each country has its own set of rules, called standards, to define what is organic and can carry the national label on its packaging.

The European Union is an exception, as the rules ("the European Organic Farming Regulation") are the same for all EU countries.

This guide deals mainly with the European Union regulation, but there is also a similar standard for the United States of America, called NOP, for Japan (JAS), as well as national certifications in many other countries (Switzerland, Turkey for example). Some countries do not have an official rule defined by law, but the certification bodies (CB) define their own standards (Australia, New Zealand). Additional information: see external references in paragraph 7.2

The EU Regulation is based on a few main principles:

- \rightarrow a ban on the use of GMOs
- \rightarrow limiting the use of artificial fertilizers, herbicides and pesticides
- \rightarrow a ban on the use of ionising radiation

 \rightarrow for animal production: a ban on the use of hormones and the use of antibiotics only when necessary for animal health.

It regulates the production, processing and trade of organic products in the EU, and provides a framework for the verification processes to use the EU organic label on finished products.



The European organic label " Euroleaf ".

The new requirements that will apply in 2025

The EU Regulation on organic production and labelling of organic products has recently been amended. The aim of these amendments is (among others) to :

extend the possibility of group certification (when several farms are included in one certificate, e.g. a PO) to European producers, who do not have access to it at the moment, and

to strengthen the requirements for group certification for producers outside the European Union

In practice, this will complicate organic certification for non-EU producers certified as a group. The main changes concern the groups that can be certified and the sampling rules during the audit. Regarding groups :

e a group of farmers must have its own legal entity

a producer group may not have more than 2000 members

each farm must be less than 5ha

the group markets its products together

- group members must be in the same area
- each group has its own internal control system

Regarding sampling during an audit :

a minimum of 5% of members (and not less than 10 members) must be inspected

laboratory tests should cover 2% of the members

For groups already certified, these changes will come into effect on 1 January 2025. There are also changes to the products and substances allowed.

Documents

- ► European Regulation 2018/848
- COLEACP analysis of the new EU regulation

2. Certification

Organic certification can be provided by two types of guarantee systems:

→ "Third party " certification in which a specialised certification body, independent of the party to be certified, carries out the audits and usually makes the certification decision, which allows the certified organisation to use the organic label for a fixed period of time (usually around one year). The certification service has a cost, which usually depends on the audit time required. The auditor's travel costs are charged as an additional fee. This system is the most common. It is relevant for long marketing channels (typically export).

\rightarrow Certification through a 'participatory guarantee system'

(PGS) in which producers and consumers are grouped together in an organisation that facilitates 'peer' audits. The cost of the audit is only the time each person has to spend on the PGS. PGSs are well suited to short value chains within one country. They can be linked to a state label or to a "private" label, specific to the SPG.

The European organic label is guaranteed only by thirdparty certification.

A certification body (CB) will come and check that the producer group complies with the rules specified in the EU organic farming regulation. In practice, the certifier does not need to check all the farms for which the group is applying for certification but will want to verify that the group has a reliable internal control and traceability system. For this, the audit will be based on:

- \rightarrow Documentation of the internal control system (ICS)
- ightarrow Interviews with the technical teams and some producers
- \rightarrow A physical inspection of a sample of farms
- \rightarrow Laboratory testing of a sample of products.

The audit will result in a report, which will list possible non-conformities (areas where compliance with the standard is unsatisfactory), as well as a certification decision and the issue of a certificate, which is usually valid for 1 to 2 years.



3. The main stages of the certification process

1	2	3	4
Pre-feasibility study	FEASIBILITY STUDY	Preparation phase	CERTIFICATION
Standard Export market potential	Technical feasability Training needs Market study Budget Planning Group motivation	Farmer list + MapLegal structure of the OPQuality, traceabilityMarketing, export logisticTraining of membersInternal control systemInternal documents and proceduresBudgetContracting external audit serviceInternal auditPreparation of documents required for auditMock audit	Agree on dates + scope of audit Audit logistics Respond to audit report Monitor corrective actions

Certification, when ?

OBJECTIVE OF THIS CHAPTER :

To shed light on strategic choices: when to launch, what to master beforehand ?

1. Value chain development strategy

Organic certification requires the mobilisation of many resources, particularly financial, and makes sense when it is part of a global strategy for the development of the sector/value chain.

Case study of the cashew nut sector in Senegal

The sector has a significant potential for economic impact, but in which there is a lot of speculation in the value chain. For many families, it is the heart of the household economy, and the sector is considered strategic. The state has announced a multi-year plan to process a third of the production locally (at present almost all the nuts harvested in Senegal are sent to Vietnam or India to be shelled, from where they are then exported to the European market). Middle men dictate prices, which are ridiculously low and disconnected from the real costs of production.

The idea of the project is a value chain model to add value locally, based on organic certification as a response to the under-valuation of the product, especially since cashew orchards are rarely sprayed.

2. The level of structuring of the PO

→ What is required for certification

As mentioned in chapter 2.1, in order to be certified, the organisation must have a legal existence (this was not a requirement until now). The legal structure must also have a maximum of 2000 members. In practice, this means that a cooperative union with 4000 members will no longer be able to carry the organic certification of all its members on its own, it will be necessary to split the internal control system, and that it be carried out by the most relevant legal entity, taking into account the actual structure, the location of the groups, and the cost of the certification.

ightarrow What is required for certification to be sustainable over time

In practice, it is necessary to have a cooperative or association structure with its own internal life and dynamism (elected representatives, general assemblies, etc.), which is of real use to its members in terms of the services provided.

The indicators to look for are:

 \rightarrow governance: the existence of elected leaders, the quality of member participation, how information flows, where and how decisions are made - among other things

 \rightarrow the professionalism of the management of activities: the presence of staff, their competence and training,

 \rightarrow the involvement of elected representatives the existence and use of production monitoring tools, etc.

AVSF has developed a number of tools to identify the support needs of farmer organisations and to carry out a diagnosis:

- → the IRI Diagnostic (Institutional Strengthening Index): this index is based on a method of evaluating the strengthening needs of organisations, based on a participatory and shared analysis of 6 dimensions of the organisation (technical capacity, administrative and financial capacity, political impact capacity, representativeness/legitimacy, democratic functioning of the organisation and governance, economic model, diversification of funding and self-financing capacity)
- The CBP Capacity Building Programme provides tools for needs analysis and capacity building planning for POs.

3. Technical feasibility

The study of technical feasibility means looking at the conditions under which it is possible to guarantee compliance with the requirements of the organic standards. In practice, this means ensuring that there is no risk of contamination with prohibited chemical products on each of the plots of land applying for certification.

Depending on the type of crop (e.g., field crop or wild harvest) and its location, this can be done in different ways. The plot must be:

- ightarrow accessible at all times (e.g., no need to cross a river),
- \rightarrow not too steep (so that there is no runoff from the top of the slope),
- ightarrow at a stage when it can produce (in the case of a tree crop orchard for example),
- \rightarrow left for 3 years without fertiliser (there may be intercropping at the time of planting)
- \rightarrow georeferenced (placed on a map)
- ightarrow surrounded by a buffer zone

Examples of buffer zones depending on the situation:

→ in a cashew orchard: the trees within a 5-metre zone around the plot are marked (visually) and the production of these trees cannot be certified

if the orchard is surrounded by plots belonging to the same producer, sorghum can be grown on a strip or in the surrounding fields (it is a crop that does not require treatments or fertilisers). On annual crops: there may be an untreated crop strip

 \rightarrow in a shea park: the technicians mark the areas to be collected with paint

There can be no intercrops or crops around/under the trees to be certified that receive (or are likely to receive) synthetic plant protection products: mixing with food crops, which are usually treated, is therefore impossible.

In practice, it is necessary to respect agricultural practices adapted to an organic production method for the product concerned. The ban on synthetic plant protection products in the organic standards1 sometimes makes it necessary to make profound changes in agricultural practices in order to find ways to control diseases and pests without these products. In general, this implies changing the production system towards agro-ecological practices.

^{ightarrow} the official legal existence of the producer group

 $^{^{\}rm I}$ Some natural products are allowed. The list authorised by the European regulation changes regularly: check with the CB.



It is important to be able to estimate the potential production volume of each plot, so as to know the total certifiable production, in order to limit the risks of mixing outside production to the certified production.

Special case of certification of wild harvested products (e.g. certain aromatic and medicinal plants, shea nuts, etc.): these can be certified organic, but there may be other sustainability issues related to the protection of the resource (forest) and its renewal.

4. The conversion period

The EU Organic Regulation provides for a conversion period* between: \rightarrow the moment when a farm starts practising organic farming and monitoring/self-monitoring these practices, or the moment when the application for certification is sent to the certification body \rightarrow and when the production can be marketed as organic.

For annual and semi-perennial crops this period is 24 months, for perennial crops 36 months. However, in practice the difference may be slight, as harvests of annual crops sown 2 years after the start of conversion can be certified, while harvests of perennial crops picked 3 years after the conversion date can be certified.

It is possible to reduce the conversion period if it can be proved that production takes place in an agricultural area that has not been treated with products prohibited in the standards for at least 3 years (uncultivated area, fallow land, or "traditional" agricultural practice). To obtain this exemption, you must:

 \rightarrow apply to the CB

 \rightarrow provide a "certificate of non-treatment" of the plots by the local authorities [large-scale phytosanitary treatment, e.g. for mosquito control]

 \rightarrow provide a history of the plots (production, cultivation activities carried out, production methods) through a farm book.

The CB then carries out an ad hoc inspection and issues a 'fallow land report', validating the total or partial exemption from the conversion period.

5. Study of the export market

Certification creates costs and sales expectations for producers. To align these different needs, export markets need to be well worked out in advance and offer purchase prices that cover the costs of certification and additional work.

A buyer will probably be reluctant to order a product that is not yet certified (even in the conversion phase). On the other hand, it is possible that all the commercial prospection work can be done before or in parallel with the certification: market research, participation in fairs (BioFach in Germany, Natexpo in France, etc.), identification and contact with target companies, sending samples, etc.



6. The possible choice of a double certification

This guide focuses on the organic export market, but it may be relevant to consider a national organic label, or a non-organic label with a similar ICS, such as fair trade.

\rightarrow A national or regional organic label

It can be a third-party certified label, or a SPG, and is aimed at the local or national market. It can be relevant to value products in conversion (if this label allows it), which cannot benefit from the European label, or to value intercrops or crops associated with the certified production. This audit can be different from the audit for the organic certification according to the European standard, or it can be a grouped audit, or a certificate automatically validated when the certification according to the EU standard is obtained.

Here too, market research can be relevant. Depending on the country, the following options exist:

- In Laos: ASEAN regional label
- In Madagascar: national law validated in 2020, the national organic committee is working on establishing standards for a national label.
- In Burkina Faso: a national organic label initiative is working closely with the state, but it is not yet validated (it is a SPG). It is focused on vegetable crops
- Senegal: no national label for the moment.

→ A fair trade label

The Burkina Faso shea cooperatives presented in this guide all have dual organic and Fair Trade certification. In their case, it is the "Fair for Life" (FfL) label, managed by Ecocert, which is audited jointly with the organic label, even if the control points are different.

There are other fair trade labels: Fairtrade International (Max Havelaar), the Small Producers Symbol (SPP)...

→ Other labels

Some buyers or markets may ask for a specific label (kosher, guaranteeing various environmental protection practices, etc.), which it may sometimes be interesting to add later on.

7. The challenge of information management

Managing the information required for organic certification, and in particular for group certification*, can be a complex task. And this is multiplied if the certifications are combined.

Each certification requires that information be kept on (i) different checkpoints of (ii) each member of the certified group, at (iii) different points in time, and how this information is (a) collected and (b) updated. Some of the checkpoints may be the same in different certifications.

This is known as an information management system (IMS). If left unchecked, these systems can become administrative monsters, requiring management skills and burdening staff because everything has to be documented in writing, staff need to know where to find the information when it is needed....

On the other hand, if well thought out, this information system can also provide interesting information for an organisation: information that can be used for technical monitoring, for the development of the PO and beyond. This information management system is necessary for the functioning of the internal control system (see paragraph 5.2).

To think this system through, two elements are important:

- The architecture refers to all the components that the information system must have in order to produce the desired data reliably :
 - what information should be collected
 - by whom
 - at what time
- how they are saved, and where
 - how the information is aggregated (to make statistics, to
 - follow the evolution in time...]
 - how to access it
 - who can access it
- quality control or assurance (reliability) of data
- → Tools: the choice of a tool can have important consequences, particularly on the way in which the organisation can take ownership of this tool. A paper-based system may require a lot of administration time (data has to be copied and aggregated), and may generate errors, but the advantage is that the level of administrative skill required is not very high. A computerised system may look good to clients or certifiers, but requires specific skills to manage it, which have a cost, although time (of data management) can also be saved. Most of all, it means that this item cannot be passed on easily (in case of staff change), or checked easily (by management, the ICS members).

Example

The plot monitoring book of the FDPAK (Fédération Départementale des Producteurs d'Anacarde de Kolda, Senegal) organic cashew nut producers shows how different levels of monitoring of each member are intertwined, and how information is collected for different purposes:

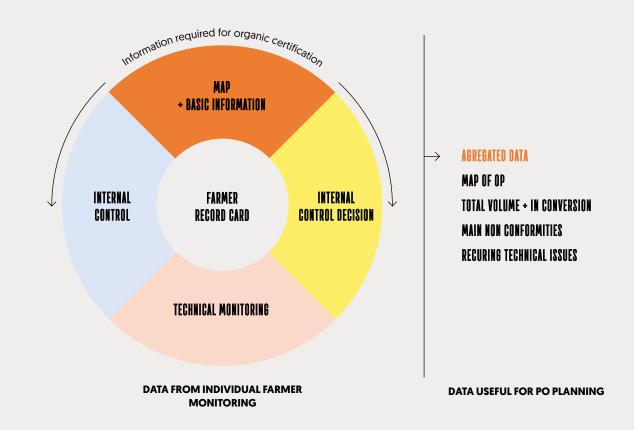
- Organic certification
- Quality
- Commercial

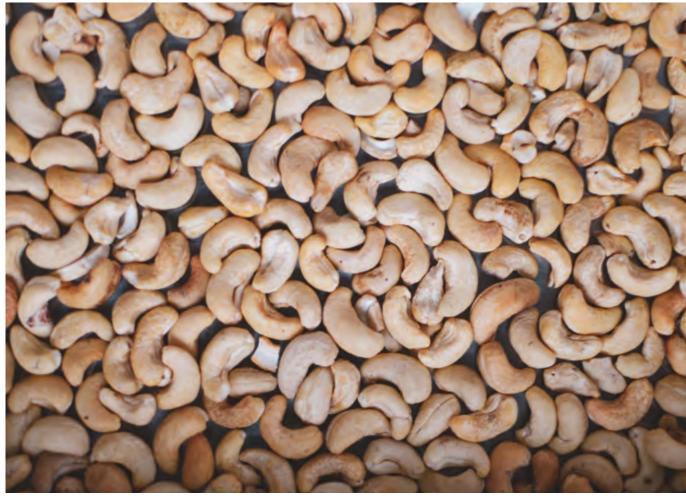
This information can also be used to provide technical advice to farmers to improve yields or quality, or to identify opportunities.

Documents

FDPAK organic cashew producers' plot monitoring booklet

LOGIC AND ORGANISATION OF THE INFORMATION SYSTEM





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CHAPTER 3

Testimonial : "What we wish we had known before going for organic certification "

OBJECTIVE OF THIS CHAPTER:

What are the experiences of POs that are now certified, what difficulties did they encounter and what advice do they want to give to POs that are considering organic certification?



The training of members in organic farming and its rules must be at the heart of the project: everyone must participate and be involved.

1. Three cooperatives of women shea producers in Burkina Faso

OP	SONGTAAB YALGRÉ ASSOCIATION (ASY)	UNION DES COOPÉRATIVES DE PRODUCTRICES DE PRODUITS DU KARITÉ DU HOUET (UCPPK-H)	UNION DES COOPÉRATIVES SOWDJOMA DE PRODUCTION DE BEURRE DE KARITÉ DES CASCADES (USCOOP-SPBK/CAS
NAME OF THE CONTACT PER- SON	Mamouna Ouedraogo	Adjara Tiemtore	Maïmouna Touré
ΑCTIVITY	Women's network specialised in processing, marketing (6 regions, 11 groups)	Collection of shea nuts, processing of almonds into butter, marketing of seeds and butter	Cooperative of women producers of shea butter, seeds
PRODUCTS	Shea (butter, seeds), sesame, moringa (seeds)	Shea (almonds and butter)	Shea (almonds and butter)
CERTIFICATIONS	Organic and FfL since 2002	Organic (2016) + FfL	organic + FfL since 2017
DATE OF CREA- TION OF THE PO	In existence since 1998	2001	cooperative formalised since 2016
NUMBER OF WOMEN PRODUCERS		6000 women	950 members
ZONE	Headquarters in Ouaga, production around the headquarters	Based in Bobo Dioulasso 2 regions: Haut Bassins and Tuy region, since 2019 groups have become cooperatives (43 + 15)	Cascades region, production unit 6km from Banfora

Presentation of the three cooperatives in Burkina Faso

2. The difficulties encountered

→ The fencing of the shea parks, where food production is forbidden: it was difficult to get the rest of the community to accept this. It took a lot of awareness-raising on the part of the internal controllers and the women producers. It was an area with a high density of trees, so it was not that complicated. The fields around it were eventually moved.

→Funding: 10 people had to be employed for 6 months (part-time) and trained in awareness raising. A client provided financial support to help with the awareness-raising phase necessary to prepare for certification.

 \rightarrow Storage of shea seeds on the farm: at the beginning, women producers put them in their homes, where insecticides can be used. The whole family must be informed of this risk. One of the solutions found was to build small cooperative warehouses near the farms, which are easily accessible.

 \rightarrow Location of production: some of the farms were located in an area of high cotton production, which uses chemical inputs and where it was not possible to produce organically. It was necessary to move from this area to another.

→Documentation follow-up: given the low level of education of most women producers, this was difficult. You have to keep little papers, record information, etc. The same goes for traceability, which is not easy either.

→Difficulty in understanding Ecocert's requirements: the documents verified are always different "it's an eternal restart". Ecocert's response is that it is a 4-year verification cycle.

3. What advice do you have for POs starting out?

They are encouraged to go for it: "it is the passport to reach certain markets". The effects go far beyond the certificate: health effects, environmental impact ...For a structure that is not yet selling, the main question is: where to find the funds?

→ Financing. It is possible for relatively well-established POs to support nascent structures: support and finance certification, purchase of beans to prevent them from getting into debt...

→The technical side. You need technicians, you need volunteers. The first person in charge worked for several years without pay before it started.

Everyone has gone to raise awareness, without remuneration: it is an investment.

There was a small group of very dedicated people at the beginning: 5 people, who went to the cooperatives to train the groups and the internal controllers. Then 5 people in each village were trained by Ecocert, and these people then trained everyone in their village.

Raising awareness about organic is important, because people think "here everything is organic". The change is not simple: the cohabitation of cotton and organic shea. The state should support this awareness-raising, and the actors should do advocacy.

→ Motivation. You have to give it your all! You always have to control - there are storage habits, etc. that you have to develop. You have to manage your anticipations; the market doesn't come right away: "you mustn't give up. You have to have a high level of morale".

You have to try to identify a market in advance, but buyers want to see the certificate before they consider a purchase.

Preparation for certification

OBJECTIVE OF THIS CHAPTER :

Once you have decided to go, how do you prepare? What are the main steps? Where are the costs? What is the budget? What resources should you rely on?

1. Traceability system

→ What is it for ?

The traceability system serves to document the entire journey of the certified raw material from field to customer. It is necessary to be able to prove that the product comes from the producer from whom it is declared to have come to ensure that the final product is really organically produced. It must also be proven that it has not been mixed, exchanged or contaminated with non-organic products.

The first step in traceability is a system of plot coding :

Example of the system used by two Senegalese cashew cooperatives: the Fédération Départementale des Producteurs d'Anacarde de Kolda (FDPAK), certified organic since 2021, and the Fédération des Champs Écoles du Birasso (FECEB), certified since 2015.

➡ 1st part of the code: letter K or B for Kolda or Birasso

 \bigcirc 2nd part of the code: the first 3 letters of the name of the group: Bakidjod = BAK

➡ 3th part of the code: the rank of the producer in the unique list of organic producers: # [5]

→ 4th part of the code: the plot number # (1) (among the plots of producer #5)

Result = K/BAK/5.1

This code is written on all bags. When each producer brings in their nuts to be weighed, they are transferred to a jute bag and this number is written on the bag.

The plot number is less important, but it is useful for monitoring the yield of each plot.

Other information can be collected at each stage of the harvesting and processing process, and can be used for quality monitoring (see FDPAK sheet below).

Documents

► FDPAK organic cashew traceability procedure

2. Internal control system

→ What it is used for ?

The internal control system must ensure that, at all times, the group respects all of its commitments relating to the organic farming standards, and can guarantee this thanks to a functional and efficient traceability system. It is a permanent self-checking system. The external auditor will check that this system is reliable, by looking at the way it is constructed and its operating rules, and by re-checking some of the control points (generally on a sample of producers). This is therefore a key element of organic certification.

In practice, this means that the CB delegates part of the control to the PO, in order to reduce control costs (the alternative being that the CB controls each producer individually).

→ What it takes to build an internal control system :

- Clearly identify what is certified:
- A single list of producers to be certified
- Mapping and geo-referencing of plots and storage points
- A coding system for the plots to identify them (producer's name and plot number)

- An operational internal control committee
- Forms to collect traceability information and follow-up documents
- Procedures that explain the control system, that are understood by all, and internal rules that specify the rules that each producer must follow

→ The Internal Control Committee :

Its operating rules are set out in a specific document (terms of reference or internal rules). In brief:

Made up of volunteer producers who can read and write

Its roles:

- Carry out the internal audit (organic practices, traceability)
- Collectively decide on the continuation or exclusion of each producer, based on the results of the internal audit
- Ensure that documents are properly completed, available and archived.

Principles:

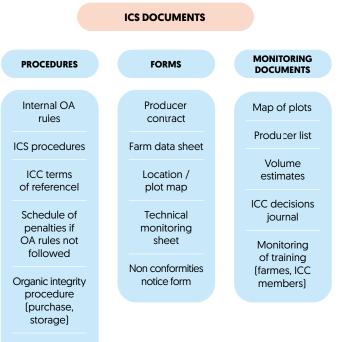
• Members should not be in a situation where a conflict of interest could be perceived: for example, they should inspect villages that are not their own

• A producer must be able to appeal a decision

• Works and meets according to a jointly agreed annual calendar, depending on harvest and external audit dates

• May be assisted by a secretariat (usually the PO team) which prepares the calendar, documents, lists decisions, etc.

INTERNAL CONTROL SYSTEM DOCUMENTS



Training modules

→ The ICS procedure manual (an example can be found below) should cover the following topics

• Description of the PO, its project; list of PO staff, members of the ICC (organisation chart)

• List and analysis of current/potential risks

• Internal rules: rules to be followed, process of entry of new members (admission), of exit (including penalties/sanctions for not following the rules)

Traceability management

• Functioning of internal control: procedures, who is involved in internal control and how, training of those involved, document management

→ Internal audit : see next chapter

Documents

- ► FDPAK Internal Control System Manual (Procedural Guide)
- Terms of reference (internal rules) of the FDPAK Internal Control Committee
- Producer list format (form)
- Non-conformity notification form
- Conflict of interest declaration (form)
- List of risks concerning biological compliance

3. Internal audit

The internal control serves as a preparation for the external audit, its purpose is essentially to reduce the cost of certification by internalising the control, otherwise each producer would have to be certified individually. It is compulsory to carry it out annually.

The internal audit may lead to the exclusion of certain members from organic certification.

The key points to be checked will depend on the production in question, the local context and will refer to the internal organic regulation.

→ Internal control

- It takes place during the harvest period, before the external control
- Carried out by trained internal auditors who are members of the Internal Control Committee
- Checks on site, in the presence of the producer, a list of control points, corresponding to the obligations of the internal organic regulation
- Is documented on a form: findings (compliant, non-compliant) and explanations.

\rightarrow Following the control

- The audit report is presented to the Internal Control Committee
- The committee notes any non-conformities, proposes corrective actions or sanctions and decides on the producer's participation in the certified group (approval, conditional approval, non-approval) or the possible downgrading* of batches delivered
- This decision is communicated to the producer concerned, together with a possible corrective action plan for the non-conformities found
- These decisions and their follow-up are recorded in writing in the "internal audit report".

→ Review of cases by the Internal Control Committee:

- Each member presents their case
- For each case the inspector presents their conclusions
- The Committee shall propose a decision, based on the OA internal rules and the list of possible sanctions

→ The internal control schedule should be constructed in such a way that all members are inspected once a year. The number of committee members and the number of meetings will depend on the geographical spread of producers, transport possibilities, the availability of committee members and the existence/competence of the committee secretariat.

Documents

- Internal audit form (form)
- ▶ List of non-conformities and penalties within the FDPAK ICS

Example of the internal control process of cashew nut PO producers in Senegal

There are several key points to check, at different times :

1. At the beginning of the season (December-January), on the plot :

respect for the buffer zone (red ribbon): a row of cashew trees (at least 10m from the neighbour's field) is well excluded from the zone within the ribbons

 use of fertilisers and chemicals - check on the plot (visual, especially herbicide for cashew)
 is it a pure crop (no association)?

- 2. <u>GAP compliance</u>: (internal control combined with technical support) on pruning or other
- 3. From 15/02 onwards: check that the right utensils are used (washed buckets, when harvesting takes place), harvesting principles (quality control), attention to contamination
- 4. <u>Storage place (10-15 days later) at the farmers'</u> <u>premises :</u> visual control of the storage place (the producer has signed

a contract saying that they accept to be controlled, even in their home/farm), verification of the marking of the containers (bags...) with the producer's number.

- <u>Document control</u>: check that the producer has kept the crop book, joined the PO, signed the contract...
- 6. Verification of the correct understanding of procedures, including traceability



4. Choice of an accredited certifier

In most West African countries, as well as in Madagascar, Ecocert seems to be the only option, but there may be other certifiers in some countries.

Important elements to know are the cost of certification, the potential dates (external audit must take place during the harvest) and the duration of the audit. This cost will depend on the structure and location of the PO, and a price offer will be made by the certifier. Once the quotation has been validated, the certifier will send a questionnaire to be completed and returned, and a list of documents to be provided.

Beware: this can take time and require numerous exchanges with the certifier! Allow 4 to 6 months before the desired date for the external audit.

For Ecocert, the documents to be filled in are the forms:

- F01 application for organic certification
- F02: Organic system plan of the producer group
- Qinfo40: Application and unit description form
- In case of direct certification (without conversion period): certificate of non-treatment* obtained from the competent authorities

The "acknowledgement of non-cultivation"* is a kind of miniaudit, with a survey, possibly sampling and analysis, used to validate (or not) the derogation to the transition period. Sometimes the "acknowledgement of non-cultivation" can be combined with the 1st audit if objective elements show that risk is low.

Documents

Example of F02 form filled in by FDPAK

Example of F01 form filled in by FDPAK

Example of Q40 form filled in by Ethicajou

5. Skills required

The skills required relate to organic production in the local context, as well as to the systems implemented by the PO in the context of certification.

Additional mapping skills are important but can be outsourced to specialist people.

There are 2 targets for training, with different training needs:

- \rightarrow members of the PO
- ightarrow members of the Internal Control Committee

Depending on the case, it is possible to rely on internal expertise (these skills exist within AVSF's teams), but it is also possible to call on external expertise - which can be provided by certification companies or independent consultants.

→Members' competences

Overall, the necessary skills concern the rules of organic farming, particularly regarding agricultural practices, and the requirements for certification, primarily traceability. These skills can be acquired through short training courses.

Before any training, it is important to make members aware of the benefits of organic farming. This awareness can be raised at a very early stage of the certification process, during the feasibility study.

The training of members on organic farming can be done intensively in 2 days. This is what was done in Senegal with the two cashew producers' POs for which certification was achieved very quickly. This training can be carried out by technicians or technical assistants of the PO, but it is also possible to call on specialised trainers, or to train members.

Example of awareness-raising arguments used with cashew producers in Senegal

The value of organic :

- 👍 good for human health,
- good for soil fertility (preservation of microfauna),
- good for the animals,
- good for the environment

<u>A local example of environmental</u> degradation due to agriculture :

that of the Koussanar area where soils have been rendered infertile by the poorly controlled use of chemical fertilisers for groundnut productionà the groundnut production area is moving further south

The question of price :

- the vicious circle of middlemen buying cheaply at a time when producers need cash the most
- the conventional price at 300-350FCFA/kg, compared to the organic price at 486FCFA/kg
- the fluctuation and uncertainty of prices, which prevents the producer from planning ahead and building personal projects

\rightarrow Competencies for the ICS

- For the members of the ICC, skills required include :
- Be able to read and write,
- Be available,
- Be motivated (involvement is voluntary, but travel and sometimes time away from home is compensated for)

In addition to these prerequisites, the following should be considered:

- ightarrow an ICS training plan
- ightarrow a capacity building plan :

• use of digital tools (ideally, the use of tablets should be considered in the medium term...)

regular updating of ICS training

The ICS requires technical support, especially at the start. This support can be reduced over time, and sustained as an in-house technician function, but experience shows that there can frequently be deviations that lead to corrective actions* in subsequent audits, and these deviations may require external support to 'put things right'.

It is important that a specific training plan is considered for one or more persons within the PO (staff or member in charge of the ICS) who will take on this function of in-house technician.

Documents

Model course for the establishment of a certification officer at cooperative level

Training manual - Internal control system of organic cashew producers

Example of a training course used with cashew producers in Senegal

Day 1: Organic production, certification

- what is organic, buffer zones, conversion periods, etc. with examples
- Organic requirements: no chemicals (fertiliser, pesticide), no use of fire, respect for buffer zones, topography
- Good Agricultural Practices: when to prune, when to thin...
- Certification: comparison à to buy a motorbike, I can go and have a look with a mechanic, certification plays the role of the mechanic for consumers
- Internal control: comparison à if l receive a stranger,
 I sweep in front of the door to clean and settle things among us before we receive the inspector

Day 2: Collection, traceability

- Explain the link to human healthà what evidence does the buyer have? How to prove it to him/her? Draw a parallel between two labels and 2 phones (iphone and samsung): which one do you prefer?
- Collecting and harvesting: which bags to use (some prohibited: onion bags, cement bags, fertiliser bags, livestock/poultry feed bags)? Bags of rice washed with solid soap, wash basins/tubs, same for the motorbike
- Harvesting: drying, sorting (just the nuts) (small nuts are removed for organic because they are too small for machines)
- Storage: secure, away from other bags, do not spray, no risk of contamination, placed on racks

6. Schedule of events

The time between the PO's decision to embark on certification and obtaining certification can be long. Just the time to prepare the documents for the external audit can take up to 9 months. The figure below shows a proposed organisation of activities into projects and sub-projects and their sequence. The period can be extended by 3 years (conversion period) if the crops have been treated with synthetic plant protection products, or if it is not possible to provide a "certificate of non-treatment" of the plots by local authorities.

					тімі	ELINE		
	PROJECTS	SUB-PROJECTS	- 18 mos	-15 mos	-12 mos	-9 mos	-6 mos	-3 mos
		Farmer monitoring sheet template	•					
1	Producer list map	Recruit geomapping expertise	•					
		Collect producer data + georeferencing						
2	Legal structure	Confirm legal existence of PO	•					
2		Identify and compile relevant data	•					
3	Quality	Implementing traceability system						
3	traceability	Implementing quality system and monitoring						
		Training modules OA, traceability, quality	•					
4	Trainning members	Recruit and train trainers	•					
		Planning of trainings						•
		Internal rules on OA	•					
5	Documents and internal	ICS procedure		•				
5	procedures	Forms	•					
		ICC decisions	•					
		ICC members election	•					
6	Internal control	ICC members training						
Ū	system	Inetrnal audit						
		ICC decisions					•	
		Quotes			•			
7	Contracts and	Questionnaires / Forms						
	audit preparation	Mock audit					•	
		Audit date decision					•	
		Audit					•	
8	Certification process	Corrective actions / action plan						•
		Certificate emission						-
9	Budget planning	Put budget together / revise						•••••
		Planning and monitoring						•••••
10	Marketing logistics	Commercial development						•••••
10	mancung logistics	Establish export logostic + doumentation			•••••			

Action

...... Intermittent action

ΑCΤΙVΙΤΥ	COST RANGE	DETAILS
TECHNICAL SUPPORT TEAM	Between €20,000 and €80,000/year	_
COST OF RUNNING THE ICS	-	Expenses, means of travel for internal inspectors, assistance with geo-referencing of plots
COST OF TRAINING MEMBERS	-	Expenses, trainers' fees; organisation of training (refreshments, etc.); paper materials?
DIRECT COST OF CERTIFICATION	2,300 to €15,000/year	High end for double certification of a large organisation that processes the product NB: The acknowledgement of non-cultivation assessment is invoiced as a separate audit.
OTHER COSTS RELATED TO CERTIFICATION	-	Possible accommodation/travel for the inspector if not covered by the direct cost
COSTS OF SAMPLE TESTING	€600 to 1,000/year	€200/sample x 3 to 5 samples Shipment to Germany and lab costs

Budgetary elements to be taken into account

7. Budget and funding

The budget to be foreseen includes direct (audit) costs, possible other direct costs (product testing), as well as all indirect (operation of the internal control system) and hidden or set-up costs.

The cost of the external audit is calculated by the certification body according to the location, the number of members, the distribution of members and the production units that will have to be visited (their number and complexity, but also the distances between the sites). A level of risk may also be taken into account (a new structure will be considered to be at higher risk than a structure that has already been audited many times without problems identified – so a goods ICS can decrease certification costs over time). For organic certification only, in Burkina Faso, the range varies from FCFA 1.5m to FCFA 5m (about $\leq 2,300$ to $\leq 7,600$).

When a second certification takes place at the same time (combined audit to obtain 2 different certificates), the costs reported by Burkina Faso shea butter cooperatives vary from FCFA 7 to 10m ($\leq 10,500$ to $\leq 15,000$). The auditor's travel and accommodation costs are to be added to the certification costs.

The indirect costs are those of the operation of the internal control system (expenses and sometimes travel costs for the internal inspectors, training, printing of documents, monitoring time, assistance for the geo-referencing of the plots, etc.). Sometimes, the certifier may ask for the internal inspectors to be paid or compensated (even if they are members of the PO) to guarantee a better independence of their work.

As for the hidden costs, these are essentially the costs of setting up the certification: support for capacity building of the cooperative, adoption of agro-ecological practices, etc. This is an investment that must take place several years before certification is obtained. For AVSF, this represents between $\leq 20,000$ and $\leq 80,000$ /year (if we take into account 2 people, the project manager and a technician, the costs of supporting the functioning of the PO (meetings, offices, etc.) and the resources necessary for the project).

8. Marketing

Once the market has been studied, a commercial relationship with a buyer interested in the organic product must be established.

- There are different ways to identify a potential buyer :
- \rightarrow Meeting at an international organic trade fair (such as BioFach)
- \rightarrow Direct approach and contact by buyer or PO
- \rightarrow Support by AVSF, or by organisations such as CBI or possibly embassies

Initially, a potential buyer will be interested in several pieces of information :

- \rightarrow The history of the PO
- \rightarrow The terroir, the quality of the product, possibly a specific quality
- \rightarrow Its organic certification, possibly other labels
- \rightarrow The quantity available
- ightarrow The fact that the product is traceable
- → How are possible risks in the sector managed: logistics, quality, health, human rights1 ...

This information can be presented in a commercial brochure presenting the PO and its products. Product samples should also be sent.

If the discussions become clearer, they can be formalised by a purchase commitment. This commitment can be oral but will need to be specified in writing. This commitment serves the PO to organise itself according to the terms of the potential future contract, but at this stage it is a document which has no legal value.

An important element of this negotiation is the selling price : this price should cover all costs: purchase of the raw material from the members, transport, operation of the PO, possible processing of the product, and the cost of organic certification. This is often referred to as a premium or "surcharge " for organic products, but the surcharge is mainly used to cover higher costs for producers and the PO. It also reflects the value of all the information that is available on the certified organic product (traceability, production practices, storage places, etc.) that is not available on a standard product that would be bought from an exporter. These cost elements must therefore be known to the PO. Then, some tradeoffs can be made: are all these general costs to be borne by the selling price to a single buyer, or are they to be distributed, and if so, according to which rule ?

Documents

Ethicajou brochure

¹See the forthcoming publication on the EU Directive on due diligence for importing companies.

Audits, and after

OBJECTIVE OF THIS CHAPTER :

to clarify the stages of the preparation between audit and export of certified products: the process, the time lag, the steps and actions to be implemented

1. Process

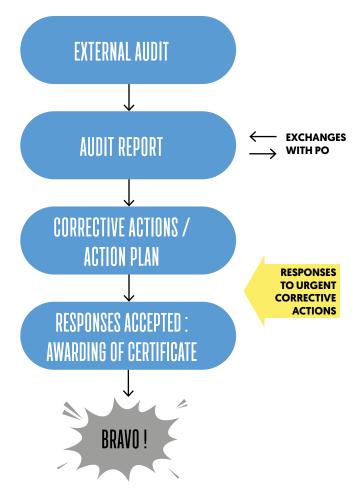
Once everything is in place and the PO feels ready, it is possible to consider a "mock audit". This is an audit carried out by a partner of the PO (e.g. a technician from another area, from a neighbouring country, etc.) or an external consultant. The results of this mock audit allow for possible adjustments to be made in order to increase the chances of being well prepared for the external audit.

The overall process of external audit and certification is presented in the following diagram.

Documents:

Sample mock audit report

CERTIFICATION PROCESS (from audit)



2. Process of an external audit

Before the audit

Based on the forms already provided to the certification body, the inspector will provide the PO with a list of the control points he/she wishes to perform:

- \rightarrow Documents to be seen on site
- \rightarrow Possible interviews
- ightarrow Facilities (storage points, processing sites, etc.)
- ightarrow Number of farms to visit

The choice of farms to be visited depends on the inspector: randomly chosen from a list, according to a predefined route or other practical considerations...

Based on the above, a number of days for the audit visit is determined, with a date.

→ Logistics : it may be necessary to reserve accommodation for the inspector for the duration of the visit. Sometimes the living expenses (meals...) of the inspector must be covered by the PO.

 \rightarrow Finance : In principle, the total or partial amount of the audit invoice is to be paid before the visit, so that the PO has no leverage on the certification body to influence its decisions.

Inspection

A person from the PO should be available to accompany the inspector during the inspection, to help organise the visits and meetings, answer questions, and "help" the inspector understand the location.

In general, the audit starts with a kick-off meeting, to explain the objective of the audit, to agree on the practical arrangements, to finalise the detailed planning, etc. At this stage, the farms to be visited should be known and the producers can be notified. The inspection normally ends with a closing meeting during which the inspector will present his/her preliminary findings.

→ Acknowledgement of non-cultivation*: See chapter 5.4

\rightarrow Samples to be taken

The audit includes testing of samples, which have to be taken during the inspection and are sent and analysed in Germany, at the expense of the PO (about \leq 200/sample). The number of samples depends on the risk of contamination, which depends on the size of the collection area. In general there are between 1 and 4 samples.

The laboratory will look for the presence of the main plant protection products used in agriculture, including mosquito repellents, which cause the most problems.

There may also be tests of water used for irrigation. In this case, the research focuses on heavy metals and chemicals, with thresholds to be respected.

→ Logistics: The inspector may not have their own means of travel, so consider providing a vehicle for the duration of the inspection, as well as catering options.

Following the inspection and taking into account the results of the tests on the samples, the inspector will produce an audit report.

3. Audit report and non-conformities to be resolved

The audit report will summarise all the inspector's findings in relation to all the points of the standards to be met.

For each point, the assessment will be that the PO complies or does not comply with the standards. The points of non-conformity can be judged as minor or major, and the certification body can give the PO a longer or shorter time step to resolve them. In the case of a first certification, some non-conformities will have to be resolved before the PO can be judged globally compliant and receive its organic certificate.

In other words, upon receipt of the audit report, there may be specific actions to be taken before certification can be validated.

There are two possible scenarios:

- → The non-conformity is major, and another external inspection must be carried out after the problem has been resolved (with significant delays and costs);
- → The non-conformity is minor, i.e. it can be resolved by providing evidence of changes to the ICS or otherwise: an action plan will need to be proposed, and if necessary additional documentation to remove the non-conformity. This can be done by e-mail.

Depending on the nature of the non-conformities, it may take more or less time to resolve them: this aspect should not be neglected, but the risk of this situation can be reduced by a mock audit beforehand.

The certification decision is normally taken by a certification committee at the level of the certification body (in a process very similar to an internal audit). The PO is then awarded an organic certificate, specifying: the nature of the certified product(s), possibly the transformation process(es), and valid for 1 to 2, or even 3 years (rarer). A new certificate must be issued before the first one expires, so this will influence the audit renewal schedule.

The organic certificate is one of the documents that must accompany the product sold to a customer.

In general, the first 2/3 years of certification entitle the product to be said to be in conversion to organic farming (in which case it cannot benefit from the organic label), unless an exemption can be granted: this is the purpose of the " acknowledgement of non-cultivation*" described in chapter 5.4.

4. Export

Once the organic certificate is received, the export of the product can begin.

A Certificate of Inspection (COI) is required once the product is certified, in order to be able to export it (this is a procedure linked to the European regulation on OA). On this issue, discuss with the buyer, who will be familiar with the procedure.

The different stages of the export process, and all the necessary activities (in particular the sending of a sample of the batch to be exported by express mail before the departure of the goods for export), as well as the organisation of the documentation are described in an annexed document: "MEMO EXPORT ORGANI-CALLY CERTIFIED PRODUCTS - THIRD COUNTRIES - France, For the use of exporting cooperatives".

The activities and documents to be produced for export are summarised in the table below.

It is up to the cooperative, the owner of the goods, to take care of the export procedures. There may be a service provider for the transport and there is always a forwarding agent at the port or airport.

ACTIVITIES	DOCUMENTS	POINTS OF ATTENTION
Signature of a contract between exporter (cooperative) and importer (client)	Contract signed	Sales price (and incoterms), delivery schedule according to deadlines, sales conditions (including pre-finance)
Harvest organisation	Valid organic certificate	Collection and storage of samples
Reception and storage of the finished product	Packing list: composition of each batch (1 batch = 1 day's delivery to the shed) Receipt slips Quality report for each batch	Clean and dry shed Storage on pallets Traceability to the producer
Sampling (to be carried out by competent authorities before departure of the consignment)	Analysis report to the port	Keep some of the sample taken
Express shipment of sample(s) to Europe to authorise export of the batch	Report on the analysis carried out in Europe	To be done before the goods leave the PO for export
Export	To be established by the PO : → Invoice → Packing list → Phytosanitary certificate → Request made to the CB for registration in → TRACES To be established by the exporter, in conjunc- tion with the freight forwarder : → Weighing certificate → Analysis of samples taken in port → Request for COI to the CB → Export bill of lading (BL)	Gross and net reference volumes: those measured at the port The exporter must also be OA certified The COI request must be made <i>prior to</i> embarkation, and the COI signed by the CB is required for embarkation



Example of the shea butter industry in Burkina Faso

There are recurring problems at several levels:

- Traceability of nuts, which is linked to the availability of the resource: fallow land is being reduced due to land pressure, and therefore buffer zones are increasing and reducing the amount of trees that can be certified. As a result, women collectors are looking for nuts outside the certified fields.
- Storage conditions (in the home) that present risks of contamination (mosquito products)
- The size and effectiveness of buffer zones: runoff can leave residues

The transport of the goods to the port can be done in several different ways, where possible, it is preferable that the goods are taken in the container from the warehouse or factory and the container sealed on site.

Some countries may have specific obligations at national level: check with the inter-professional organisation or the competent authorities.

Documents

• Export process specific to Madagascar, in the "Manual of Good Practices - Process for the transformation until export of essential oils".

5. Long-term monitoring and points of vigilance

Some aspects are likely to be a recurring problem, as they are difficult to manage, and the safeguards provided by the ICS may appear insufficient to the inspector.

This is where a risk analysis can be useful as a tool for monitoring these issues, both before the audit and on an ongoing basis.

The consequence of not taking these risks into account is the de-certification of the entire producer organisation. This risk is not to be taken lightly, as it can seriously damage a long-term relationship with customers, not to mention the price drop that may ensue for the producers.

The POs' technical partners can intervene to provide answers to non-conformities, but the line between support and interference (e.g. redoing the entire traceability protocol in a hurry) can be blurred: even if it is for the right reasons, is it useful in the long term?

6. Other certifications

A single PO may seek multiple certifications, and some of the checkpoints are likely to overlap.

- In this case, it is possible to:
- \rightarrow Combine internal control systems into one
- \rightarrow Combining several audits into one works if the auditors are accredited on the different labels.

References

Where to find additional resources and information

IN-HOUSE

Manual on the certification process, illustrated and in Malagasy : "Fampiofanana ny mpikambana momba ny fambolena biolojika "

EXTERNALLY

Centre for the Promotion of Imports from developing countries (CBI)

Agency of the Dutch Ministry of Foreign Affairs <u>Website:</u> www.cbi.eu : in English

Its role is "to help small and medium-sized enterprises (SMEs) strengthen their economic, social and environmental sustainability. To help SMEs export products and services to European and regional markets.

The centre produces numerous studies of the European organic market.

OrganicExportInfo

This is a website run by FiBL, the Swiss organic farming research organisation.

Website: www.OrganicExport.Info

OrganicExportInfo provides information on the legal requirements and certification schemes relevant for the export of organic products to different target countries. For each country there is information on:

1) mandatory organic standards and labels,

- 2) important voluntary organic standards and labels,
- 3) certification bodies/approved inspection bodies,
- 4) import requirements and
- 5) additional information.

IFOAM

The IFOAM website has resources, including on ICS: https://www.ifoam.bio/our-work/how/standards-certification/internalcontrol

Organic Africa

The Organic Africa website (also a FiBL project mentioned above: www.organic-africa.net/) presents a training manual on organic agriculture (in the African context), in 3 languages (French, English and Swahili). A chapter is dedicated to export and certification. There is a guide and training modules.

This guide was written in January 2022 by **Karine Laroche** and **Anaïs Chotard**, on the basis of information collected from AVSF teams working with organic producer organisations, and in some cases having supported them to obtain this certification. Contributors to this guide include:

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Illustrations were produced by **Marion Legrand**, based on photos provided by AVSF.

Organisations supported by AVSF to obtain their organic certification:

2018-2022

Cashew nuts

Project Agricoop (Madagascar) Fanohana and Magneva Spices, essential oils, fruits

2020-2023 Action innovante Kolda (Sénégal) FECEB and FDPAK 2018-2025 Project Equité 1 and 2 (West Africa) Several

Cocoa, shea butter, cashew nuts, fruits...

2017-2020 Action innovante Akebou (Togo) Atsemawoe Cocoa

Lexicon

Acknowledgement of non-cultivation: mandatory for Ecocert before the audit. This is a kind of audit, with control in the field, possibly sampling and analysis – in practice a mini audit to validate the transition period derogation. Sometimes the 2 audits can be combined if the risk is not huge (if there are objective elements)

Audit: Audit and control are often interchanged, however, control can mean more precisely the precise moment of physical verification, while audit can mean more globally the whole process leading to certification, of which control is part.

Certificate: This is the document, in the name of the PO, which formalises the organic nature of the cooperative's products which are listed on the certificate.

Certificate of non-treatment: official document from the Ministry of Agriculture which attests that these plots have not received any large-scale treatment (e.g. against locusts or mosquitoes) for the last 3 years.

Certification: Process of obtaining an organic certificate

Control: see audit

Conventional: Characteristic of a product that is not organic.

Conversion period: This is the period between [i] the application for (external) organic certification to a certification body and/or the start of organic practices, and (ii) the moment when the PO is officially certified organic. In general, 3 years for perennial crops, and 2 years for annual crops. But there can be a "retroactive" conversion if there is evidence that no chemicals have been used (acknowledgement of non-cultivation and certificate of non-treatment).

Downgrading: The process of withdrawing the organic status of products that were previously certifiable, following a finding of non-compliance with the internal organic rules.

Group certification: as opposed to the individual certification of each producer and entity that takes possession of the certified product (for processing or marketing), group certification allows a collective (under certain conditions) to carry out the certification collectively, in order to reduce the cost.

Internal control: System for verifying compliance with the PO's internal organic rules, set up within, and administered by, the PO. It is mandatory.

Internal Control System (ICS): A quality assurance system internal to the PO, which provides a guarantee of production according to organic rules.

Non-compliance: Finding of non-compliance with the organic standard

Standard: Rules for organic farming. In this document, the standard used is the European Union's agricultural regulation.

Traceability: System that allows the product to be followed from the plot to the final consumer

Organic Certification Preparation Manual For Producer Organisations

ANNEX 1

Checklist of documents required before applying for certification

- O Proof of the legal existence of the requesting entity (responsible)
- O Organizational chart of the group and / or detailed organisational chart
- O General organisation chart of the ICS team and decision-makers
- O Copy of the contract between the PO and each member (template)
- O Procedure for admission of new members (producers or processing/exporting unit) or new plot or new area
- O List of non-conformities and associated corrective actions or sanctions in case of non-compliance with organic production rules by members
- O Description of the traceability system and product identification
- O At least 2 examples of completed internal visit sheets (internal control report)
- List of producers (Excel table preferred) specifying member code, list of people involved, productive area for each O member, history of plots (last 3 years), date of entry into the group, date of start of conversion, estimated quantity, classification of the plot, etc.
- O Stages of cultivation practices and their frequency
- List of possible risks to organic compliance for each stage of production of the products to be certified and measures put in place to avoid these risks as well as the persons involved in the implementation of these measures
- Map and/or diagram showing the location of all project sites AND the location of the plots according to the mode selected o above (clearly showing the limitations of the organic plots subject to certification and the neighbouring plots such as non-organic plots, pastures, roads, buildings, buffer zones)
- O If applicable, proof of non-treatment of the plots for at least 3 years
- O Past production history (see list of producers and plot sheets)
- O Copies of EC or equivalent organic certificates and/or NOP for seed, annual seedlings or vegetative propagating material or perennial seedlings
- O Proof of absence of GMOs
- O Copy of input labels, composition and certificate of compliance of inputs
- O Form concerning the commercial unavailability of the relevant inputs (seeds/plants/plants for reproduction and non-organic ingredients)
- O Map showing the location of processing and storage facilities
- O Diagram of the processing and product flow in the unit showing the movement of biological products from receipt of raw materials to outgoing products. All equipment and storage should be identified
- O Label templates for each product type

ANNEX2 Checklist of documents needed during the audit

OA Standards	O Transport procedure (with cleaning)
Maps / list of area to be certified and members	O Interim storage procedure
Updated list of organic members and producers	O Vehicle cleaning procedure
List of plots and history (including surface area, year of conversion, production potential)	 O Shop cleaning procedure Procedure for disseminating communication informatio
Map of production areas + storage/grouping and collection points	(mail, tel)
Certificate of non-treatment of plots	O Information tools of the certification body
Documentation for each producer	O F02
Individual contracts stating their commitment to organic production and compliance with all procedures	O Q info 40 O Producer database
Field operation monitoring sheets/book	O ICC Annual Report
Harvest register	O Training (with minutes or report and attendance list)
1 copy of the plot sheet	O Training on OA standard
Flow of goods documentation	O GAP training
Collection sheets	O Training on certification with Ecocert and ICS
Stock book	O Training on traceability
Purchase documents	O Training on quality testing
Transport documents	O Storage facility documents
ICC Documentation	O Collection table
ICC organisation chart	O List of organic producers posted
Minutes of the election of the ICC members	O Export bill of lading
Conflict of interest sheet	O Receipt slip
Reports	O Sales invoice
Election report	O Stock book
ICC Annual Report (after external audit)	O Commercial contract with PO displayed
ICC Activities Plan	O Analysis results
ICC templates	O Cleaning booklet
Internal inspection form (see plot monitoring form)	O Facility code
Conflict of interest declaration form	O Collection data register
Non-conformity notification form	O Factory documents
Sanction form	O Contracts with supply cooperatives
ICS Manual	O Description of the factory (size of buildings, number of people, organisation chart, etc.)
Internal rules	O Process description with flow chart and diagram
ICS diagram	O Identification of risks and control points
Description ICC and members' commitment	O Cleaning procedure for buildings
Traceability procedure	O List of products used for cleaning and pest control
Procurement procedures	O Product reception sheet
Procedure for harvesting (collection) of products (including cleaning of tools and containers)	O Reception procedure
Sales or marketing procedure	O Quality control procedure
Product registration procedure	O Quality approval form
product separation procedure	O Stock register
Packaging procedures manual: storage, packaging, labelling	O Separation procedure in case of non-compliance
Quality test procedure	O Packaging labels for EU export (to be validated by Ecoc



Project carried out with the support of Agence Française de Développement



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